



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Case Management
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Governor

KIM GUADAGNO
Lt. Governor

BOB MARTIN
Commissioner

Patricia Simmons-Pierre
Remedial Project Manager
USEPA Region 2
290 Broadway, 20th Floor
New York, NY 10007-1866

October 7, 2015

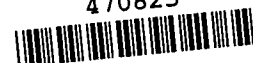
Re: L. E. Carpenter
Wharton, Morris County, New Jersey
SRP PI# 003017

Dear Ms. Simmons-Pierre:

The New Jersey Department of Environmental Protection (Department) has completed a review of the document titled "Transmittal of Unfiltered and Filtered Groundwater and Surface Water Sampling Results for bis-2-ethylhexyl phthalate" dated August 17, 2015, submitted pursuant to CERCLA and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (Tech Rules).

The Department's comments on the submittal are provided below.

1. The document states that ground water samples were collected in accordance with the procedures outlined in the Department's Field Sampling Procedures Manual. The document does not state which specific sampling procedures were implemented to obtain the ground water samples. This must be provided in the document.
2. The Department does not allow the use of filtered results to determine that ground water delineation is complete. Samples must be unfiltered. An evaluation of the well construction and sampling techniques may be needed in order to reduce or eliminate any problems related to turbidity in unfiltered samples.
3. If L.E. Carpenter believes that ground water delineation of DEHP is complete, it must be clarified whether the requirements for the submission of a Classification Exception Area (CEA) proposal to the Department in accordance with N.J.A.C. 7:26C-7.3 have been met. During the July 15, 2015 site visit/meeting, it was explained to L.E. Carpenter representatives of the necessity to fully delineate, both horizontally and vertically, the extent of ground water contaminated by DEHP.
4. No DEHP was detected above criteria in filtered surface water samples, however these results are from dilute surface water and do not accurately reflect what benthic organisms may be exposed to. During the above referenced site visit/meeting, the Department (also on behalf of USEPA per prior discussions) requested a comprehensive round of surface water, sediment, and sediment pore water sampling, conducted simultaneously in both the eastern drainage channel and the Rockaway River, in order to fully delineate potential ground water to surface water discharge pathways and to evaluate potential impacts to aquatic receptors.

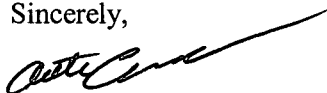


It was noted that L.E. Carpenter would wait until 3Q15 DEHP sampling results were received to finalize their comments on the need for additional wetland contaminant delineation. Subsequently, L.E. Carpenter has requested that a final decision on this issue be deferred until after 4Q15 confirmatory sampling is conducted.

Please incorporate these comments into the letter that the USEPA will be sending to L.E. Carpenter.

If you have any questions regarding this matter I may be contacted at (609) 633-1416, or at Anthony.Cinque@dep.state.nj.us.

Sincerely,



Anthony Cinque, Case Manager
Bureau of Case Management

cc: Steve Byrnes, NJDEP/BEERA
Daryl Clark, NJDEP/BGWPA